

From: [Bray, Dave](#)
To: ["Ken Merrill"](#)
Subject: RE: Permit Review for Ponderay Newsprint Company
Date: Wednesday, February 8, 2017 11:36:00 AM
Attachments: [image004.png](#)

Thanks Ken.

We'll look at that.

But just for your information, EPA's modeling rules allow for an initial analysis of the emissions from the project alone and if the impact is not significant, then there is no requirement to model the nearby sources. I don't know if that was the case here so we'll look to see what they did.

Dave

From: Ken Merrill [mailto:kmerrill@kalispeltribe.com]

Sent: Wednesday, February 08, 2017 9:14 AM

To: Bray, Dave

Subject: RE: Permit Review for Ponderay Newsprint Company

I'm also not sure if they included the emissions in their modeling exercise from the neighboring Locomotive refinishing/painting operation conducted by the Port of Pend Oreille and the Vaagen Wood chipping/sawmill operation just downwind in Usk. --Ken

Ken Merrill

Water Resources Program

(509) 447-7276 (office)

(b) (6)

KNRD-color



From: Bray, Dave [mailto:Bray.Dave@epa.gov]

Sent: Tuesday, February 07, 2017 6:04 PM

To: Ken Merrill

Subject: RE: Permit Review for Ponderay Newsprint Company

Hi Ken,

It looks like there are a couple of issues/questions here that we should look into. I'll get this to both our modeler and our permit engineers to see what they think about the technical issues – emission calculations, major source status, modeling – and I'll do some thinking about options the Tribe might pursue with Ecology to address its concerns.

Do you know if the NOC application is available on Ecology's website? I can get the current Title V permit from their website but often they don't post NOC applications.

Talk to you soon.

Dave

David C. Bray

Associate Director for Air

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EPA Region 10

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(206) 553-4253

From: Ken Merrill [<mailto:kmerrill@kalispeltribe.com>]

Sent: Tuesday, February 07, 2017 4:44 PM

To: Bray, Dave <Bray.Dave@epa.gov>

Subject: FW: Permit Review for Ponderay Newsprint Company

Hi David,

Attached is a brief review provided by an EPA contractor of the Newsprint pulp mill's air permit located just upwind of the reservation that is being modified by Ecology to add more emissions. Based on the permit review, there seems to be some incorrect basis of the previous permit conditions and classification of the facility as a minor source. We are going to have had a call with Andrew from SCA to discuss their review on Monday. We have also asked for an extension to the comment period and a consultation with Ecology. Could you and your staff please take a look and provide some assistance to the Tribe on what recourse we may have to better protect our air quality from this source?

Thanks --Ken

Ken Merrill

Water Resources Program

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KNRD-color



From: Andrew D. Shroads, QEP [<mailto:ashroads@scainc.com>]

Sent: Friday, February 03, 2017 9:57 AM

To: Ken Merrill

Cc: JPrice@indecon.com; Colon.Toni@epa.gov; Phil Norwood; Stephen Edgerton

Subject: Permit Review for Ponderay Newsprint Company

Please find attached to this email a permit review of the Ponderay Newsprint Company (PNC) Notice of Construction (NOC) application for installation of an electric chipper/debarker. The review included the NOC application, Title V air operating permit, associated support documents, and news releases, to determine the compliance and permit status of the PNC facility. Conclusions and recommendations are included at the end of the permit review.

Please let me know if you have any questions or comments regarding this permit review. If you would like to participate in a conference call to discuss the permit review or any related actions, please let me know, and I will make the appropriate arrangements.

Sincerely,

Andrew D. Shroads, QEP

Senior Air Quality Specialist / Regional Manager



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